

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
AT WHEELING

<i>COMPLAINT OF BELLAIRE VESSEL MANAGEMENT, LLC, as Owner of the MOTOR VESSEL CAPT ROBERT G HARRISON, and BELLAIRE HARBOR SERVICE, LLC, as Charterer of the MOTOR VESSEL CAPT ROBERT G HARRISON, FOR EXONERATION FROM OR LIMITATION OF LIABILITY</i>)	Civil Action No. 5-18-cv-00115-FPS
)	
<i>IN THE MATTER OF CAMPBELL TRANSPORTATION CO., INC. AS OWNER, OF THE M/V JAMES R. MOREHEAD, OFFICIAL NO. 1032410, FOR EXONERATION FROM OR LIMITATION OF LIABILITY</i>)	Civil Action No. 5-18-cv-00137-FPS
)	
<i>IN THE MATTER OF CAMPBELL TRANSPORTATION CO., INC., AS OWNER AND INLAND MARINE SERVICE, INC., AS OPERATOR AND OWNER PRO HAC VICE OF THE M/V LOUISE S, OFFICIAL NO. 513659, FOR EXONERATION FROM OR LIMITATION OF LIABILITY</i>)	Civil Action No. 5-18-cv-00138-JPB
)	

NOTICE OF SUGGESTION ON PENDENCY OF BANKRUPTCY FOR MURRAY ENERGY CORPORATION, ET AL., AND AUTOMATIC STAY OF PROCEEDINGS

PLEASE TAKE NOTICE that on October 29, 2019, Murray Energy Corporation and certain of its direct and indirect subsidiaries, including Murray American River Towing, Inc., Mon River Towing, Inc., Murray American Transportation, Inc. and Ohio County Coal Co. (collectively, the “Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), in the United States Bankruptcy Court for the Southern District of Ohio (the “Bankruptcy Court”). The Debtors’ chapter 11 cases are being jointly administered under the lead case *In re Murray Energy*

Corporation, Case No. 2:19-BK-57017 (collectively, the “Chapter 11 Cases”). A copy of the voluntary petition of the lead Debtor, Murray Energy Corporation, is attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that pursuant to section 362(a) of the Bankruptcy Code, the Debtors’ filing of their respective voluntary petitions gives rise to a stay, applicable to all entities, of, among other things: (a) the commencement or continuation of any judicial, administrative, or other action or proceeding against the Debtors (i) that was or could have been commenced before the commencement of the Chapter 11 Cases or (ii) to recover a claim against the Debtors that arose before the commencement of the Chapter 11 Cases; (b) the enforcement against any of the Debtors or against any property of each of the Debtors’ bankruptcy estates of a judgment obtained prior to the commencement of the Chapter 11 Cases; and (c) any act to obtain possession of property of or from any of the Debtors’ bankruptcy estates, or to exercise control over property of any of the Debtors’ bankruptcy estates.¹ No order has been entered in the Chapter 11 Cases granting relief from the automatic stay.

PLEASE TAKE FURTHER NOTICE that additional information regarding the status of the Debtors’ chapter 11 cases may be obtained by (i) reviewing, free of charge, the docket of the Debtors’ chapter 11 cases on the website of the Debtors’ claims and noticing agent, Prime Clerk, at <https://www.primeclerk.com> (ii) visiting the Court’s website at <https://ecf.ohsb.uscourts.gov> (PACER login and password required) in accordance with the procedures and fees set forth therein, or (iii) contacting the following proposed counsel for the Debtors: Alexander Nicas, Kirkland & Ellis, LLP, 601 Lexington Ave, New York, New York 10022, Telephone: (212) 390-4135.

¹ Nothing herein shall constitute a waiver of the Debtors’ rights to assert any claims, counterclaims, defenses, rights of setoff or recoupment, or any other claims against any party to the above-captioned cases. The Debtors expressly reserve all rights to contest any claims that may be asserted against the Debtors.

Dated: October 30, 2019

Respectfully submitted,

BENESCH FRIEDLANDER COPLAN &
ARONOFF, LLP

By: /s/ Joseph Blalock
Joseph Blalock (WV#12090)
44 15th Street, Suite 2
Wheeling, WV 26003
614-223-9359
614-223-9330 (Fax)
jblalock@beneschlaw.com

SANDBERG PHOENIX & von GONTARD P.C.

John S. Sandberg #22664MO
Casey F. Wong #62258MO
600 Washington Avenue - 15th Floor
St. Louis, MO 63101-1313
314-231-3332
314-241-7604 (Fax)
jsandberg@sandbergphoenix.com
cwong@sandbergphoenix.com

*Attorneys for Ohio County Coal Company, Murray
American River Towing, Inc., Murray American
Transportation, Inc., and Mon-River Towing, Inc.*

CERTIFICATE OF SERVICE

I, Joseph Blalock, certify that on the 30th day of October, 2019, the foregoing *Notice of Suggestion on Pendency of Bankruptcy for Murray Energy Corporation, et al. and Automatic Stay of Proceedings* was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

Dated: October 30, 2019

/s/ Joseph Blalock

Joseph Blalock (WV#12090)
44 15th Street, Suite 2
Wheeling, WV 26003
614-223-9359
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jblalock@beneschlaw.com